



November 15, 2010

via email and U.S. mail

United States Environmental Protection Agency
Region V
RCRA Enforcement Branch (HRE-8J)
77 Jackson Street
Chicago, IL 60604
Attention: Carolyn Bury, Project Coordinator

Subject: Administrative Order
Docket No. V-W-89R-45
Arkema Inc.
Riverview, Michigan
MID 005 363114
Progress Report #124

Dear Ms. Bury:

In accordance with Task IV, Subtask B of Attachment IV to the above-referenced Administrative Consent Order (ACO), this letter will serve as the Bi-monthly Progress Report covering corrective action activities for the East Plant during the period of September and October 2010. A bi-monthly progress report for activities at the West Plant and West Brine Field will be submitted under separate cover by Mr. Bob Wright of Arkema Inc. (Arkema).

This report describes progress during the reporting period towards fulfilling the requirements of the ACO. A description of the activities anticipated for November and December 2010 is also included.

I. East Plant Activities Completed in September and October 2010

CMS Task IV

The CMS is currently under review by USEPA.

Interim Remedial Measures

Operation of the Halowax groundwater containment system continued. All discharge was within POTW permit limitations.

Since pumping began in 2001, 860,910 gallons of groundwater have been extracted and treated by the Halowax Area treatment system and approximately 385 gallons of DNAPL have been recovered. A total of 17,890 gallons were extracted and treated during the reporting period.

Other Activities

A Project Agreement to perform additional investigation and prepare a feasibility study for the Trenton Channel under the Great Lakes Legacy Act was executed.

II. Corrective Action Activities Anticipated for November and December 2010

CMS Task IV

Submit the additional data and analysis requested by USEPA.

Interim Remedial Measures

Operation and maintenance of the Halowax groundwater containment system will continue.

Other Activities

Work on the Great Lakes Legacy Act project to perform additional investigation and prepare a feasibility study for the Trenton Channel will continue.

Based on the above information, LSS believes that all project activities during the reporting period were in full compliance with the requirements of ACO. If you have any questions or comments regarding this information, please call me at (610) 594-4435.

Sincerely,



Michael Pinto
Principal Environmental Engineer
Legacy Site Services, LLC

cc: Mr. Peter Quackenbush- MDNR - Waste Management Div. Lansing
Mr. Lawrence Aubuchon- MDNR - Waste Management Div. Livonia